Williams, Robert

From:	Gisleson, John
Sent:	Tuesday, February 20, 2007 5:47 PM
To:	'Sheean, Christopher'
Cc:	Williams, Robert

Subject: IKE v. VEO/VEO Document Production

Chris --

We need an answer on the issue of supplemental production of the Voyager documents I requested in my 2/1 letter. We will need to file a motion to compel if VEO refuses production.

If there are 5 completed boilers, there should be five complete sets of drawings. As you know, there generally are differences in designs depending on the size of the boiler, while different customers may have different specifications. As a result, we need complete drawings sets for each boiler sold.

As shown during the MECS depositions, VEO used proposals substantially similar to the Keystone proposals (and in certain sections of the proposals the verbatim language). We want to show that this was not an isolated event, as well as determine whether there are other proposals that contain information supporting a finding of copying of the Keystone designs.

The cost information recently produced also is inadequate. There should be (among other things) estimate sheets prepared by VEO in developing costs, which were not there. Those estimates are important in assessing profit margins and comparing final to predicted costs. It defies logic that VEO was guessing when it developed bid prices; it must have created estimating/pricing sheets to develop its final prices offered to customers.

Please advise. Thanks.

John

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